

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
Miami Division**

DONALD J. TRUMP,

Plaintiff,

Case No. 23-cv-21377-DPG

v.

MICHAEL D. COHEN,

Defendant.

DEFENDANT'S MOTION FOR HEARING

Defendant, Michael D. Cohen, by and through undersigned counsel and pursuant to this Court's Order Setting Discovery Procedures, identifies the following issues to be heard during the discovery hearing scheduled for Thursday, August 17, 2023, at 9:30am in person at James Lawrence King Federal Justice Building, 99 N.E. Fourth Street, Tenth Floor, Courtroom Five, Miami, Florida 33132:

I. Defendant's Objections to Plaintiff's First Request for Production.

Defendant seeks an order overruling Plaintiff's objections to Defendant's First Request for Production and compelling Plaintiff to produce responsive documents. Plaintiff has raised various objections to thirty-four requests, which Defendant seeks to have overruled and to compel production of responsive documents. (Requests Nos. 2, 3, 4, 5, 6, 18, 19, 26, 27, 34, 35, 37, 38, 39, 40, 44, 45, 46, 48, 49, 50, 51, 52, 53, 54, 55, 59, 60, 65, 66, 67, 68, 69, and 61). Plaintiff has raised no objection to eleven requests and indicated that documents "will be produced," for which Defendant seeks to compel production of responsive documents by a date certain (Requests Nos. 7, 11, 12, 14, 15, 36, 41, 43, 58, 62, and 63).

The parties have conferred via email and zoom regarding these matters but have not been able to reach agreement.

CERTIFICATE OF GOOD FAITH CONFERRAL

Pursuant to S.D. Fla. L. R. 7.1(a)(3), undersigned counsel for Defendant certifies that he has conferred with Plaintiff's counsel in a good faith effort to resolve the issues raised herein, but have been unable to resolve the disputes.

Respectfully submitted,

By: /s/ Max A. Eichenblatt
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Counsel for Defendant Michael D. Cohen

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this July 21, 2023, a copy of this filing was submitted electronically via the CM/ECF system to all parties that have entered an appearance in this case and on the Court's electronic system.

By: /s/ Max A. Eichenblatt
Max A. Eichenblatt